



DEPARTMENT OF THE ARMY
U.S. ARMY CHEMICAL MATERIALS ACTIVITY
PUEBLO CHEMICAL DEPOT, BUILDING 1
45825 HIGHWAY 96 EAST
PUEBLO, COLORADO 81006-9330

Chron21-00621

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
Attention: Mr. Kevin Mackey
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

RE: Permit Modification Request B004, *Additional Waste Storage in the Agent Processing Building (APB)*

Dear Mr. Mackey:

The Permittees at the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) are submitting the enclosed Class 2 Permit Modification Request B004, titled *Additional Waste Storage in the Agent Processing Building (APB)*, to revise the PCAPP Permit, No. CO-20-09-02-01.


The Permittees request approval to increase the waste storage capacity in the Munitions Washout System (MWS) Room in the APB by modifying Part IV, the *Hazard Preparedness and Prevention Plan*, Attachment J; and the *Inspection Plan*, Attachment K, of the PCAPP Permit, No. CO-20-09-02-01.

In addition, Section 4 of the PCAPP Hazardous Waste Permit Part A Form has been updated to replace the PCAPP Resource Conservation and Recovery Act (RCRA) Research, Development and Demonstration (RD&D) Permit, No. CO-04-07-01-01 with the PCAPP RCRA Part B Permit, No. CO-20-09-02-01.

A request for temporary authorization (TA) to implement the proposed modifications is being transmitted in accordance with 6 CCR 1007-3 § 100.63(e) in a separate letter (Chron21-00622). This TA is necessary to prevent disruption of ongoing waste management activities during the period when plant modifications associated with Permit Modification Request B001 are being implemented.

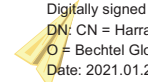
For all technical matters, please contact Mr. Michael Saupe, Bechtel Pueblo Team Environmental Manager, at (719) 549-5455. For all matters related to the request, please contact Dr. Patrick Sullivan with the Assembled Chemical Weapons Alternatives staff at (719) 549-4523.

Sincerely,

 Digitally signed by
COBB.MICHAEL.WAYNE.1128565
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Michael W. Cobb * Date
Colonel, U.S. Army
Commanding

Harrawood,
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K.E. Harrawood * Date
Project Manager, Bechtel National, Inc.
Bechtel Pueblo Team Project Manager

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Date: 2021.02.01 14:43:45 -07'00'

Walton W. Levi * Date
PCAPP Site Project Manager
Pueblo Chemical Agent-Destruction Pilot Plant

Enclosures

CC:

Ms. Gail Wallingford-Ingo, Pueblo County Planning/Development, 229 West 12th Street,
Pueblo, CO 81003-2810

Mr. Jesse Newland, US EPA Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129

Mr. Walton W. Levi, PCAPP, 45825 Highway 96 East, Pueblo, CO 81006-9330

PCAPP Document Control Center, 45825 Highway 96 East, Pueblo, CO 81006-9330

Mr. Angus MacKelvey, Pueblo Chemical Depot, 45825 Highway 96 East, Pueblo, CO
81006-9330

Mr. Trevor Klotz, Sentinel, 650 South Cherry Street, Ste 1140, Denver, CO 80246

*In accordance with 6 CCR 1007-3 Sections 100.12 and 100.42(k), I certify under penalty of law that, except as specifically noted, this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

PCAPP Permit Modification Request

Hazardous Waste Permit Number: CO-20-09-02-01

Permit Modification Request Title: *Additional Waste Storage in the Agent Processing Building (APB)*
(Modification B004)

Classification: Class 2 Permit Modification Request

Description of Changes:

The Permittees request approval of this Class 2 permit modification request to add additional waste storage capacity to the Munitions Washout System (MWS) Room in the Agent Processing Building (APB) by modifying Part IV; the *Hazard Preparedness and Prevention Plan*, Attachment J; and the *Inspection Plan*, Attachment K, of the PCAPP Permit, No. CO-20-09-02-01.

In addition, the Hazardous Waste Permit Part A Form in Attachment A has been updated to include the PCAPP Permit, No. CO-20-09-02-01, issued on 2 September 2020.

List of Permit Modifications

The proposed revision to the List of Permit Modifications provides a description of the modifications to the permit pursuant to approval of this request. (Enclosure 1)

Part IV

The Permittees propose to update Section IV.D.4.a.ii to add storage of waste items on pallets, to provide container equivalency for the palletized waste items, to revise the equivalency for containers that are six gallons or less in volume, and to update the permit conditions for stacking of containers and waste items. These revisions are presented using “track changes” in Enclosure 2 and include the following:

- Waste items on each 72 inch x 30 inch pallet are equivalent to three 85- or 95-gallon drums.
- Waste items on each 60 inch x 30inch pallet are equivalent to two 85- or 95-gallon drums.
- Two < six-gallon containers (e.g., pails or buckets) are equivalent to one 55-gallon drum.
- ≤ Six-gallon containers may be stacked two high in a manner that ensures the stability of the stacked containers.
- > Six-gallon containers shall not be stacked more than one high.
- Hazardous waste items stacked on pallets shall not exceed five feet in vertical height and shall be stacked in a manner that ensures the stability of the pallet.

Part A and Attachment A

Section 4 of the Hazardous Waste Permit Part A Form has been updated to replace the reference to the PCAPP Resource Conservation and Recovery Act (RCRA) Research, Development and Demonstration (RD&D) Permit, No. CO-04-07-01-01, with PCAPP RCRA Part B Permit, No. CO-20-09-02-01. The updated Part A is provided in Enclosure 3.

Hazard Preparedness and Prevention Plan, Attachment J

The Permittees request an update of Appendix J-1 to increase the current MWS Room (APB-125) approved storage capacity by three drums, one 4 foot (ft) x 6 ft bin, and four pallets of waste items, and to clarify the equivalent container volumes. The Permittees also request approval to store both combustible and non-combustible waste items on the pallets. These revisions are presented in the following excerpt from Appendix J-1, and in Enclosure 4 using “track changes”. (Blue text denotes additions and red strikethrough text denotes deletions.)

“Inventory limit for each of the 10 Base Plate Collection Buckets is 25 base plates from 4.2-inch mortars.

No more than **thirty-three (33)** ~~nine (9)~~ total secondary hazardous waste containers consisting of **the following: a maximum of seven (7) 55-gallon drums plus a maximum of two (2) 4 ft X 6 ft bins.**

- Inventory limit of thirty (30) containers/base units based on the following 55-gallon base unit equivalents:
 - Two (2) ≤ six-gallon containers = one (1) 55-gallon drum
 - One (1) container with volume > six-gallons and ≤ 55-gallons = one (1) 55-gallon drum
 - One (1) 85- or 95-gallon drum = two (2) 55-gallon drums
 - One (1) 72 inch x 30 inch pallet = three (3) 85- or 95-gallon drums = six (6) 55-gallon drums
 - One (1) 60 inch x 30 inch pallet = two (2) 85- or 95-gallon drums = four (4) 55-gallon drums

AND

- Three (3) 4 ft x 6 ft bins

Drum (55, 85, 95-gallon) containers, ~~and~~ ≤ 55-gallon containers (e.g., ~~six~~ 5-gallon pails), **and waste items on pallets** must be stored in a dedicated area, or areas, that have boundaries marked-out on the floor or otherwise delineated, and each 4 ft X 6 ft bin container must be stored in one of **three (3)** ~~two~~ dedicated 8.5 ft x 6.0 ft areas that have boundaries marked-out on the floor or otherwise delineated. See Permit Conditions IV.D.4.a.ii through IV.D.4.a.ii.(N) for additional storage requirements.

~~Storage of non-combustible hazardous waste items, (e.g., pumps, piping, etc.) that cannot be placed in a waste container due to size, shape or weight shall be limited by the Permittees ability to maintain the required aisle space. All non-combustible hazardous waste items shall be drained of any free liquids and shall be placed on a metal pallet no more than one item high, unless CDPHE provides concurrence on an alternative storage~~

~~arrangement/configuration.~~—Stored ~~non-combustible~~ hazardous waste items and containers shall be arranged to allow their inspection in accordance with the Inspection Plan (Permit Attachment K).

Twenty-eight (28) inches minimum aisle space between rows of secondary hazardous waste, waste container, or waste item and structural walls. ~~Or non-portable equipment or steel pallets with non-combustible hazardous waste items.~~ A row of hazardous waste containers or steel pallets with ~~non-combustible~~ hazardous waste items (one container/item wide) may be placed against, or less than 28 inches from structural walls, or non-portable equipment when a minimum 28-inch aisle space is maintained to the front of the row.”

Inspection Plan, Attachment K

The requested revisions to the *Inspection Plan* inspection criteria for the MWS Room include the following and are presented using “track changes” in Enclosure 5.

- Deletion of inspection criteria for 155 mm projectiles on the Munition Body Reject Table and the MWS.
- Modification of the “Container Inventory, Limits, Aisle Space, and Configuration” inspection criteria in Table K-11 to increase the approved storage capacity in the MWS Room by three (3) 55-gallon drums, one 4 ft x 6 ft bin, two 72 inch x 30 inch pallets of waste items, and two 60 inch x 30 inch pallets of waste items, or equivalent containers using a 55-gallon base unit to define the equivalency.
- Addition of an inspection criteria to verify that waste items are stacked in a manner that ensures stability of the pallet and does not exceed five feet in vertical height.
- Formatting revisions in Table K-11 to improve page breaks and to update the Table K-11 headings and page numbers (*revisions are not shown with track changes in Enclosure 5*).

The Permittees request the following revisions to the *RCRA Inspection Sheet: APB – Weekly – MWS* (PCAPP Form OPS-OAP-F036) in Appendix K-4. These revisions are presented using “track changes” in Enclosure 6.

- Deletion of “Cavity Access Machine (155 mm projectile) (MZ-B02-0101 through 0105 and MZ-B02-0201 through 0205)”.
- Deletion of 155 mm projectiles from the inventory limit inspection criteria on the Munition Body Reject Table and the MWS.
- Modification of the “Container Inventory, Limits, Aisle Space, and Configuration” inspection criteria for the MWS Room to implement the proposed revisions to Table K-11 of the *Inspection Plan*.
- Addition of an inspection criteria to verify that waste items are stacked in a manner that ensures stability of the pallet and does not exceed five feet in vertical height.

Justification for Changes:

The proposed increase to the approved MWS Room container and waste item storage inventory is needed for storage of hazardous waste and waste items generated during campaign changeover, during implementation of the long term solution for the Spent Decontamination System per PMR B001, and for future replacement of the Spent Decontamination System hoses and connections per PMR B001 and the revisions to the *Corrosion Monitoring Plan* proposed in PMR B002.

Part IV

The addition of equivalent hazardous waste containers for palletized waste items is requested to provide flexibility in the use of designated pallet storage locations identified in Figure 1.

Initially, the pallet locations depicted in Figure 1 will store palletized hazardous waste items generated during removal of the MWS Cavity Access Machines (CAMs) during campaign changeover and the implementation of the Spent Decontamination System long term solution (e.g., CAM frames and machine parts, pumps, and piping). The pallet storage areas will be used for hazardous waste drums when the locations are not needed for storage of palletized hazardous waste items.

Part A in Attachment A

The Part A identifies sufficient capacity for the additional proposed storage as container storage and storage in a containment building (process codes S01 and S06); therefore, no modification is required to the Part A storage capacity pursuant to this permit modification request.

An update to the Hazardous Waste Permit Part A Form is being submitted to add the PCAPP Permit, No. CO-20-09-02-01 to Section 4, Other Environmental Permits, and to delete the PCAPP RCRA RD&D Permit, No. CO-04-07-01-01.

- PCAPP Permit, No. CO-20-09-02-01, was issued on 2 September 2020
- PCAPP RCRA RD&D Permit, No. 04-07-01-01, expired in September 2020

Hazard Preparedness and Prevention Plan, Attachment J, and Appendix J-1

The increase in the current MWS Room hazardous waste container and waste item storage capacity by three drums, one 4 ft x 6 ft bin, and four pallets of waste items is needed for effective management of secondary hazardous waste.

Aisle Space and Stacking of ≤ Six-Gallon Containers

The MWS Room has sufficient open area to allow this increase in storage capacity while maintaining adequate aisle space for inspections and to allow entry and egress during an emergency. The proposed locations for the drums, bins, and pallets (or drum equivalents) are identified in Figure 1.

The proposed increase in storage capacity, the identified waste storage locations, and stacking of ≤ six-gallon containers have been discussed with the Pueblo Chemical Depot (PCD) Fire Chief.

Agent Processing Building (APB)
(Not to Scale)

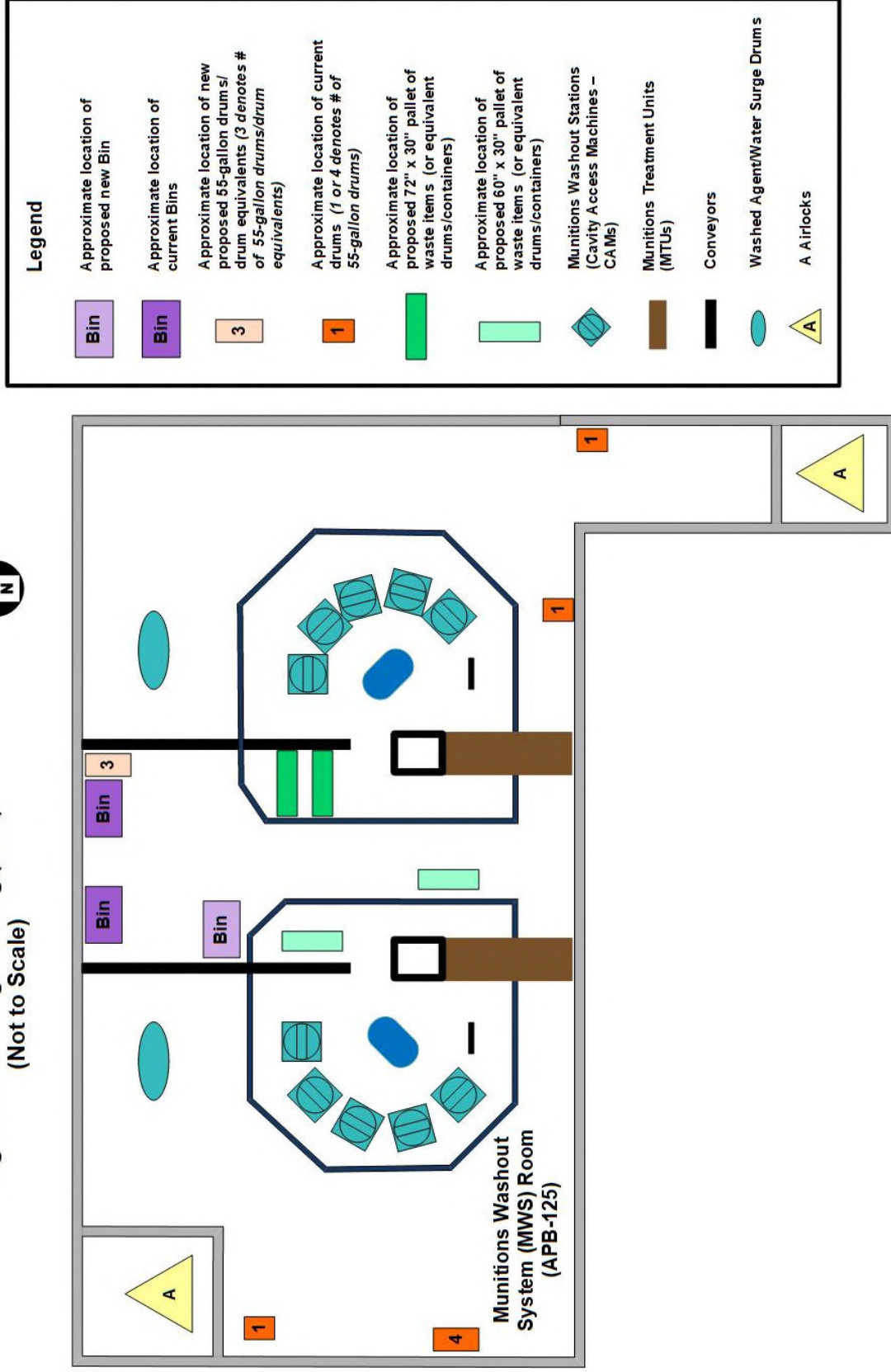


Figure 1 Approximate Locations of Hazardous Waste Containers and Palletized Hazardous Waste Items in the MWS Room

Combustible Loading in the MWS Room

The Permittees also request approval to store both combustible and non-combustible waste items on the pallets and in all of the containers. This request is based on a comparison of the waste portion of the MWS Room combustible loading calculation upon which the current MWS Room storage capacity permit conditions are based.

- *Engineering White Paper – Fire Protection and Life Safety Assessment of APB Fire Loading* (24852-RD-30H-M30-M0001) was previously submitted with PMR 88 to the PCAPP RD&D Permit, No. CO-04-07-01-01.
- The combustible/energy loading calculation assumes that the Permittees use a compactor to package six demilitarization protective ensemble (DPE) suits into a drum and forty DPE suits into a bin.
- The Permittees do not use a compactor to package DPE suits into drums or bins; therefore, only a maximum of three DPE suits are packed into each drum and five DPE suits into each bin.
- The reduced number of DPE suits in the drums and bins has resulted in a need for additional approved storage capacity.
- The MWS Room is a large open area with sufficient square footage to accommodate increases in combustible loading without significantly raising the room’s energy load. However, the proposed increase in storage is not expected to increase the combustible/energy loading in the MWS Room.

The following table compares the combustible waste storage limit identified in the *Engineering White Paper – Fire Protection and Life Safety Assessment of APB Fire Loading* with the proposed maximum inventory for MWS Room combustible hazardous waste storage in this permit modification request. As identified in the table, the proposed combustible waste inventory (in terms of DPE suits) in this permit modification request is less than the calculated combustible storage identified in the *Engineering White Paper – Fire Protection and Life Safety Assessment of APB Fire Loading*.

MWS Room Combustible Waste Storage Capacity Comparison					
	DPE Suits per Drum	No. Drums	DPE Suits per Bin	No. Bins	Total DPE Suits
<i>Engineering White Paper – Fire Protection and Life Safety Assessment of APB Fire Loading</i>	6	12	40	2	152
Proposed hazardous waste storage using drum equivalents for pallets and all drums containing DPE suits	3	30	5	3	105
Note: <i>Engineering White Paper – Fire Protection and Life Safety Assessment of APB Fire Loading</i> (24852-RD-30H-M30-M0001) is provided in the Supplemental Information folder on the enclosed Compact Disc (CD).					

Inspection Plan, Attachment K and Appendix K-4

The proposed revisions to Table K-11 and *RCRA Inspection Sheet: APB – Weekly – MWS* (PCAPP Form OPS-OAP-F036) provide inspection criteria for management of the hazardous waste and waste items in accordance with the current and proposed permit conditions.

During discussions with the PCD Fire Chief regarding the proposed storage inventory and the container and pallet locations in the MWS Room, the PCD Fire Chief stipulated that neither the containers nor pallets block egress or restrict personnel from exiting in an emergency.

To verify these proposed permit conditions, inspections will include verification of the following:

- The life safety egress requirements are met.
- The ≤ six-gallon containers are stacked in a manner that ensures stability of the stacked containers.
- The waste items are stacked in a manner that ensures load stability and are stacked no higher than five feet.

Justification for Classification:

In accordance with 6 CCR 1007-3 Part 100 Appendix I to Section 100.63, the following supports the determination that this permit modification request meets the criteria for classification as a Class 2 permit modification request.

- 6 CCR 1007-3 Section 100.63: Requested revisions keep the permit current with operations anticipated in the current design. The revisions do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health and/or the environment. (Class 1 modification)
- 6 CCR 1007-3 Part 100, Appendix I, F.1.b.: The proposed revision to the MWS Room's container storage capacity results in less than a 25% increase in the facility's storage capacity. (Class 2 modification)
- 6 CCR 1007-3 Part 100, Appendix I, M.1.b.: The proposed revision to the MWS Room's container storage capacity results in less than a 25% increase in the containment building storage capacity. (Class 2 modification)
- 6 CCR 1007-3 Part 100, Appendix I, F.4. and M.5.: The proposed hazardous waste and hazardous waste item storage locations will not be used for storage of different wastes. The increased hazardous waste capacity is requested for waste streams that are currently generated and stored in the APB. (Class 1 is not applicable)

Enclosures:

- Enclosure 1: Proposed Revisions to the *List of Permit Modifications* with changes depicted using “track changes”
- Enclosure 2: Proposed Revisions to Part IV, with changes depicted using “track changes”
- Enclosure 3: PCAPP Hazardous Waste Permit Part A Form
- Enclosure 4: Proposed Revisions to Appendix J-1 in the *Hazard Preparedness and Prevention Plan*, Attachment J, with changes depicted using “track changes”
- Enclosure 5: Proposed Revisions to the *Inspection Plan*, Attachment K, with changes depicted using “track changes”
- Enclosure 6: Proposed Revisions to the *RCRA Inspection Sheet: APB – Weekly – MWS* (PCAPP Form OPS-OAP-F036), Appendix K-4, with changes depicted using “track changes”

Enclosed CD contains complete MS Word files for the List of Modifications, Attachments J and K of the PCAPP Permit, No. CO-20-09-02-01, and a PDF of the Engineering White Paper – Fire Protection and Life Safety Assessment of APB Fire Loading (24852-RD-30H-M30-M0001).

Enclosure 1

Proposed Revisions to the *List of Permit Modifications*
with changes depicted using “track changes”

Modification: W006 Class: 1 - Self-Implementing Effective Date: November 19, 2020
Title: Revise Table G-1 Emergency Coordinator List
Summary: This permit modification updated the names, phone numbers and titles listed in Table G-1 PCAPP Emergency Coordinator List of the Contingency Plan, Attachment G.

Modification: W007 Class: 1 - Self-Implementing Effective Date: December 8, 2020
Title: Update 24852-SOP-B00-W0048, W0049 and CAP
Summary: This permit modification revised the revision numbers in Table E-2 for the following three procedures: *G-Block Secondary Waste Storage and Shipment*, 24852-SOP-B00-W0048 (005 PCN-019-00203 to 006), *Treatment of Agent Contaminated Waste*, 24852-SOP-B00-W0049 (001 to 002), and *Corrective Action Program*, 24852-GPP-GAM-00023 (007 PCN-020-00077 to 008).

Modification: W005 Class: 1 - Self-Implementing Effective Date: December 8, 2020
Title: Incorporation of PCAPP Forms from PMR B001 into the Permit
Summary: On December 8, 2020, PCAPP revised the Permit to add the 10 revised PCAPP Forms OPS-OAP-F018, -F019, -F020, -F021, -F022, -F022, -F023, -F024, -F025, -F026, -F041 and the new PCAPP Form OPS-OAP-F124 that were submitted in Permit Modification Request/Temporary Authorization (PMR/TA) B001. These 11 PCAPP Forms were issued on December 8, 2020. No additional changes, other than formatting and pagination editing, were made to the PCAPP Forms from what was submitted in the TA that was approved by Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management (Division) on November 2, 2020.

Modification: B007 Class: 1 Effective Date: December 9, 2020
Title: Waste Laydown Yard, P- and U-Series Hazardous Waste Codes
Summary: This permit modification provides a list of all P- and U-series hazardous waste codes previously managed in the Waste Laydown Yard as required by the compliance schedule permit condition in Section I.J.5.c.

Modification: B006 Class: 1 Effective Date: December 10, 2020
Title: "Waste Analysis Plan and Operations Plan, 105mm Projectile M5 Bursters"
Summary: This permit modification updates Tables D-2-3 and D-5-1 in the Waste Analysis Plan, Attachment D; Figure -7 in the List of Drawings, Attachment E; and Table L-1-Building and Corridor Compliance Table in the Operations Plan, Attachment L, to address 105 mm projectile M5 burster composition and to update the net explosive weight (NEW) requirements for the 105 mm projectile campaign.

Modification: B004 Class: 2 Effective Date: [insert date]
Title: "Additional Waste Storage in the Agent Processing Building (APB)"
Summary: This permit modification revises Part IV; the *Hazard Preparedness and Prevention Plan*, Attachment J; and the *Inspection Plan*, Attachment K, to add additional waste storage capacity to the Munitions Washout System (MWS) Room in the APB. In addition, the list of other environmental permits has been updated in the Part A, Attachment A.

Modification #B001 Class: _____ Effective Date: _____
Title: _____
Summary: _____

Enclosure 2

Proposed Revisions to Part IV, with changes
depicted using “track changes”

IV.D.4. APB General Operating Requirements

IV.D.4.a. APB Hazardous Waste Storage

IV.D.4.a.i. APB Munitions Storage Areas – Operating Requirements:

Waste munitions that have had all the energetic wastes removed from them will be transferred to the APB to the Munitions Body Storage Building and the Munitions Receiving Room. Waste munitions in the Munitions Body Storage Building and the Munitions Receiving Room shall only be stored on slave pallets or in single round containers or propelling charge containers. Slave pallets shall be stored as shown on Figure G, “APB Subpart DD Typical Storage Arrangement,” included in Appendix E of this Permit. MINICAMS[®] shall continuously monitor the APB Munitions Storage Areas including the Munitions Body Storage Building.

IV.D.4.a.ii. APB Hazardous Waste Container Storage

Hazardous waste containers and items are permitted for storage in the following APB Rooms: Toxic Room (Room APB-120), Toxic Maintenance Areas (TMA) A, B, and C (Rooms APB-126, -127, -128, respectively), TMA Airlock B (Room APB-137), the South Corridor (Room APB-130), Munitions Washout System Room (Room APB-125), Off-gas Treatment Room (Room APB-116), Hydrolysate Hold Tank Room (Room APB-122), Glovebox Sampling Room (Room APB-129), and the Munitions Receiving Room (Room APB-114).

IV.D.4.a.ii.(A) Storage will occur in containers, bins, and on pallets: primarily in

- Containers including 55-gallon high-density polyethylene (HDPE) open-head drum containers and various other containers may be used for storage including, but not limited to open-head 55-gallon steel drums, closed-head 55-gallon HDPE and steel drums, 85- or 95-gallon HDPE open-top drums, open-top soft-sided polyester 4 ft x 6 ft bins, and less than 55-gallon containers (e.g., open top five and 12.5-gallon HDPE plastic pails and open and close top HDPE 30-gallon drums). Open top drums will be closed with a ring closure lid and closed top drums with threaded plugs. Pails will be closed with a snap or screw lid.

- The 4ft x 6ft bins will not be covered as they store closed plastic bag containers.
- Waste items may be stored on pallets.

IV.D.4.a.ii.(B) Containers with free liquids may be stored in the Toxic Room (Room APB-120), APB Toxic Maintenance Areas (TMA) A, B, and C (Rooms APB-126, -127, -128, respectively), and TMA Airlock B (Room APB-137) Munitions Washout System Room (Room APB-125), and the Glovebox Sampling Room (Room APB-129) without additional secondary containment as the floors in these rooms are coated and designed to provide secondary containment. Absorbents may be added to containers of solid-phase hazardous waste that contain liquid or may generate condensation.

IV.D.4.a.ii.(C) Secondary containment must be provided for the storage of containers with free liquids in the South Corridor (Room APB-130), the Munitions Receiving Room (Room APB-114), the Off-gas Treatment Room (Room APB-116) and the Hydrolysate Hold Tank Room (Room APB-122). Such secondary containment consisting of pans or secondary containment pallets must have the capacity to contain at least 10 percent of the total volume of all containers or the volume of the largest container for the respective secondary containment structure, whichever is greater.

IV.D.4.a.ii.(D) Containers must be stored in dedicated areas that have boundaries marked-out on the floor, or otherwise delineated.

IV.D.4.a.ii.(E) The Permittees must not exceed the storage limits for each room as specified in Appendix J-1, "Storage Capacities and Requirements," in the Hazard Preparedness and Prevention Plan (Attachment J of this Permit).

For the purpose of determining compliance with these storage limits:

- ~~Two~~ ~~Each five~~ ~~six~~ or less gallon containers ~~pail~~ are equivalent to one 55-gallon drum (i.e., two ~~≤ six-gallon pails = one 55-gallon drum~~), ~~or~~
- ~~One other~~ container > six gallons and ≤ 55-

gallons in volume ~~container, replaces~~ is equivalent to one ~~a~~ 55-gallon drum ~~one for one~~ (i.e., one ~~> six~~ ~~five~~-gallon and ~~pail or other~~ \leq 55-gallon container = one 55-gallon drum).

- Each 85 or 95-gallon drum is equivalent to ~~shall~~ ~~replace~~ two 55-gallon drums (i.e., one 85 or 95-gallon drum = two 55-gallon drums).
- In the Munitions Washout System Room (Room APB-125), hazardous waste items on a 72 inch x 30 inch pallet are equivalent to three 85- or 95-gallon containers of hazardous waste, and hazardous waste items on a 60 inch x 30 inch pallet are equivalent to two 85- or 95-gallon containers of hazardous waste.

IV.D.4.a.ii.(F) Pallets if used shall be metal in the TMA-A (Room APB-126), TMA-B (Room APB-127), and TMA Airlock B (Room APB-137). Pallets if used shall be wood, metal or plastic (polyvinylchloride) in the Munitions Receiving Room (Room APB-114), Munitions Washout System Room (Room APB-125), Off-gas Treatment Room (Room APB-116), Hydrolysate Hold Tank Room (Room APB-122), Toxic Room (Room APB-120), TMA-C (Room APB-128) and the South Corridor (Room APB-130).

IV.D.4.a.ii.(G) Plastic pallets not in use shall not be stacked or leaned against another pallet(s).

IV.D.4.a.ii.(H) Wheeled drum dollies if used must be constructed of metal with poly or rubber wheels.

IV.D.4.a.ii.(I) ~~> Six-gallon~~ ~~E~~containers shall not be stacked more than one high nor exceed a vertical height of five (5) feet.

\leq Six-gallon containers may be stacked two high in a manner that ensures the stability of the stacked containers.

Hazardous waste items stacked on pallets shall not exceed five (5) feet in vertical height and shall be stacked in a manner that ensures the stability of the pallet.

IV.D.4.a.ii.(J) For each room the maximum square footage of the

dedicated areas that have boundaries marked-out on the floor or otherwise delineated for container storage shall not exceed 1000 ft².

- IV.D.4.a.ii.(K) ~~Hazardous waste~~ containers and ~~noncombustible~~ hazardous waste items must be stored in a manner that meets NFPA egress and Inspection Plan (Permit Attachment K) aisle requirements.
- IV.D.4.a.ii.(L) A row of hazardous waste containers or metal pallets with ~~non-combustible~~ hazardous waste items (one container/item wide) may be placed against, or less than 28 inches from, structural walls or non-portable equipment when a minimum 28-inch aisle space is maintained to the front of the row.
- IV.D.4.a.ii.(M) Each hazardous waste container and ~~pallet of hazardous waste~~ item(s) stored in the APB must be marked with a unique tracking/identification number.
- IV.D.4.a.ii.(N) Each hazardous waste container and ~~and pallet of hazardous waste~~ item(s) stored in the APB must be marked with the words “Hazardous Waste” or have a hazardous waste label affixed. Hazardous waste labels/markings must be legible and oriented to allow inspection.
- IV.D.4.a.ii.(O) Treatment of agent contaminated waste and waste items will be performed in the MWS Room and Toxic Room in accordance with Section V.B, and Table V-10 in Part V of this Permit.


IV.D.4.b. APB Tank Units

- IV.B.4.b.i. The Permittees may not store hazardous waste in permitted tanks that are not compatible with the materials of construction of the affected tank. The Permittees shall not place hazardous wastes in any tank system if the waste could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail.
- IV.B.4.b.ii. Reserved.
- IV.B.4.b.iii. If a release occurs from a tank system, the Permittees shall repair the tank system prior to returning it to service.

Enclosure 3

PCAPP Hazardous Waste Permit Part A Form

Permit Modification Request B004
*Additional Waste Storage in the Agent
Processing Building (APB)*

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	
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1. Reason for Submittal (Select only one.)

<input type="checkbox"/>	Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility and/or generator of > 1,000 kg of hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input checked="" type="checkbox"/>	Submitting a new or revised Part A Form

2. Site EPA ID Number

C	O	8	2	1	3	8	2	0	7	2	5
---	---	---	---	---	---	---	---	---	---	---	---

3. Site Name

Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP)
--

4. Site Location Address

Street Address	45825 Highway 96 East		
City, Town, or Village	Pueblo	County	Pueblo
State	Colorado	Country	USA
		Zip Code	81006-9330

5. Site Mailing Address

Same as Location Address

Street Address	45825 Highway 96 East		
City, Town, or Village	Pueblo		
State	Colorado	Country	USA
		Zip Code	81006-9330

6. Site Land Type

<input type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input checked="" type="checkbox"/> Federal	<input type="checkbox"/> Tribal	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
----------------------------------	---------------------------------	-----------------------------------	---	---------------------------------	------------------------------------	--------------------------------	--------------------------------

7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary) 562211	C.
B.	D.

8. Site Contact Information

Same as Location Address

First Name Walton	MI W	Last Name Levi
Title PCAPP Site Project Manager		
Street Address 45825 Highway 96 East		
City, Town, or Village Pueblo		
State Colorado	Country USA	Zip Code 81006-9330
Email walton.w.levi.civ@mail.mil		
Phone 719-549-4842	Ext	Fax

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

Same as Location Address

Full Name Pueblo Chemical Depot	Date Became Owner (mm/dd/yyyy) 9/30/1942
Owner Type <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
Street Address 45825 Highway 96 East	
City, Town, or Village Pueblo	
State Colorado	Country USA Zip Code 81006-9330
Email	
Phone	Ext Fax
Comments	

B. Name of Site's Legal Operator

Same as Location Address

Full Name Bechtel National, Inc	Date Became Operator (mm/dd/yyyy) 11/1/2005
Operator Type <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
Street Address 45825 Highway 96 East	
City, Town, or Village Pueblo	
State Colorado	Country USA Zip Code 81006-9330
Email	
Phone	Ext Fax
Comments	

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
<input checked="" type="checkbox"/>	a. LQG	-Generates, in any calendar month (includes quantities imported by importer site) 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
<input type="checkbox"/>	b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
<input type="checkbox"/>	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
If "Yes" above, indicate other generator activities in 2 and 3, as applicable.		
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Mixed Waste (hazardous and radioactive) Generator	
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	4. Treater, Storer or Disposer of Hazardous Waste—Note: A hazardous waste Part B permit is required for these activities.	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	6. Recycler of Hazardous Waste	
<input type="checkbox"/>	a. Recycler who stores prior to recycling	
<input type="checkbox"/>	b. Recycler who does not store prior to recycling	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	7. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption	
<input type="checkbox"/>	b. Smelting, Melting, and Refining Furnace Exemption	

B. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D012	D013	D018
D019	D020	D021	D022	D023	D024	D025
D026	D027	D028	D029	D030	D031	D032
D033	D034	D035	D036	D037	D038	D039

C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes. Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

K901	K902	K903	P909	P910		

10.B. Waste Codes for Federally Regulated Hazardous Wastes (Continued from previous page)

D040	D041	D042	D043	F001	F002	F003
F004	F005	P-series	U-series			

11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)**A. Other Waste Activities**

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Transporter of Hazardous Waste—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Underground Injection Control
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Recognized Trader—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter

B. Universal Waste Activities

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If “Yes” mark all that apply. Note: Refer to your State regulations to determine what is regulated.
<input checked="" type="checkbox"/>	a. Batteries
<input type="checkbox"/>	b. Pesticides
<input checked="" type="checkbox"/>	c. Mercury containing equipment
<input checked="" type="checkbox"/>	d. Lamps
<input checked="" type="checkbox"/>	e. Other (specify) <u>Electronic Devices/Components</u>
<input checked="" type="checkbox"/>	f. Other (specify) <u>Aerosols</u>
<input type="checkbox"/>	g. Other (specify) _____
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	1. Used Oil Transporter—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Processor
<input type="checkbox"/>	b. Re-refiner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Off-Specification Used Oil Burner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Used Oil Fuel Marketer—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
<input type="checkbox"/>	b. Marketer Who First Claims the Used Oil Meets the Specifications

12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR 262 Subpart K.

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Opting into or currently operating under 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories—If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<input type="checkbox"/>	1. College or University
<input type="checkbox"/>	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/>	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or univer-
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Withdrawing from 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories.

13. Episodic Generation

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If “Yes”, you must fill out the Addendum for Episodic Generator.
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14. LQG Consolidation of VSQG Hazardous Waste

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQGs hazardous waste.
--	--

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
A. <input type="checkbox"/> Central Accumulation Area (CAA) <input type="checkbox"/> Entire Facility	
B. Expected closure date: _____ mm/dd/yyyy	
C. Requesting new closure date: _____ mm/dd/yyyy	
D. Date closed : _____ mm/dd/yyyy	
<input type="checkbox"/>	1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)
<input type="checkbox"/>	2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

16. Notification of Hazardous Secondary Material (HSM) Activity


<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	A. Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), or (27)? If “Yes”, you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	B. Are you notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate? If “Yes”, you may provide explanation in Comments section. You must also document that your recycling is still legitimate and maintain that documentation on site.

17. Electronic Manifest Broker

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
--	--

18. Comments (include item number for each comment)


19. Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative LEVI.WALTON.WAYNE.1231431558 <small>Digitally signed by LEVI.WALTON.WAYNE.1231431558 Date: 2021.01.27 07:49:35 -0700'</small>	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last) Walton W. Levi	Title PCAPP Site Project Manager
Email walton.w.levi.civ@mail.mil	
Signature of legal owner, operator or authorized representative  <small>Digitally signed by COBB.MICHAEL.WAYNE.1128565953 Date: 2021.02.01 16:08:46 -0700'</small>	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last) Michael W. Cobb	Title Colonel, US Army, Commanding
Email michael.w.cobb8.mil@mail.mil	

19. Certification (Continued from previous page)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative Harrawood, Kenneth <small>Digitally signed by: Harrawood, Kenneth DN: CN = Harrawood, Kenneth C = US O = Bechtel Global Corporation Date: 2021.01.26 10:30:11 -07'00'</small>	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last) Kenneth E. Harrawood	Title PCAPP Project Manager
Email keharraw@bechtel.com	

United States Environmental Protection Agency HAZARDOUS WASTE PERMIT PART A FORM	
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1. Facility Permit Contact

First Name	Walton	MI	W	Last Name	Levi
Title	PCAPP Site Project Manager				
Email	walton.w.levi.civ@mail.mil				
Phone	719-542-4842	Ext		Fax	

2. Facility Permit Contact Mailing Address

Street Address	45825 Highway 96 East				
City, Town, or Village	Pueblo				
State	Colorado	Country	USA	Zip Code	81006-9330

3. Facility Existence Date (mm/dd/yyyy)

9/30/1942

4. Other Environmental Permits

A. Permit Type	B. Permit Number											C. Description	
R	C	O	1	3	1	2	2	3	0	1			PCD RCRA Permit
R	C	O	2	0	0	9	0	2	0	1			PCAPP RCRA Part B Permit
E	E	S	.	1	0	.	4	1	8	3	1		PCAPP Wastewater Treatment Facility
E	0	4	P	B	0	8	2	2					PCAPP Air Construction Permit
E	2	0	2	0	-	2	4	8					PCAPP Pueblo County Certificate of Designation (Part B)
N	C	O	R	1	2	A	9	9	F				PCAPP NPDES General Permit (Stormwater)
N	C	O	N	C	E	0	0	5	8				PCAPP NPDES No Exposure Certification

5. Nature of Business

Chemical Munitions Destruction Facility

6. Process Codes and Design Capacities

Line Number	A. Process Code					B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
						(1) Amount	(2) Unit of Measure		
01	S	0	6	215	Y	003	MSM		
02	S	0	6	877	Y	001	ERB et al		
03	T	9	4	4352	J	003	PMD		
04	S	0	6	220	Y	001	ESM		
								(Continued on page 12)	

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line No.	A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes												
								(1) Process Codes					(2) Process Description (if code is not entered in 7.D1))							
01	K	9	0	1	3,504,782	P	S	0	6	T	9	4	Comments Section 11							
02	K	9	0	1	118,228	P	T	0	1	S	0	2	Comments Section 11							
03	K	9	0	1	571,068,874	P	S	0	6	T	9	4	S	0	2	Comments Section 11				
03							X	0	2	T	0	1	X	9	9	(Line 03 continued)				
04	K	9	0	2												Included with above				
05	K	9	0	3												Included with above				
06	D	0	0	0												** Included with above - Comments Section 11				
07	K	9	0	1	181,368	P	S	0	6	T	9	4	S	0	1	Comments Section 11				
08	D	0	0	0												** Included with above - Comments Section 11				
																(Continued on page 13)				

8. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

9. Facility Drawing

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

10. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

11. Comments

<p>Section 7, Line 01: Represents the liquid weight of HD. Process waste codes associated with the K901 waste code follow the same process and waste codes identified in Line 03. Section 7, Line 02: Represents the liquid weight of HT. Process waste codes associated with the K901 waste code follow the same process and waste codes identified in Line 03.</p>
<p>Section 7, Line 03: Represents the total liquid waste that will be annually processed carrying the K901, K902, or K903 waste codes (begins with the liquid weight of the agent in Lines 1 and 2, increasing in weight as agent is drained, processed through the hydrolyzers, biotreatment system, and brine reduction system. Characteristic codes in Line 3 apply to Lines 1 and 2.</p>
<p>Section 7, Lines 06 and 08: "D000" may represent the following hazardous waste codes: D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D042, D043. Characteristic waste codes apply to Lines 01 through 05, and 07.</p>
<p>Section 7, Line 07: Represents the total explosive weight of the 105 mm projectile campaign.</p> <p style="text-align: right;">(Continued on page 14)</p>

6. Process Codes and Design Capacities (Continued)

Line Number		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit Of Measure		
0	5	X	0	2	2943	Y	002	MWS
0	6	X	0	3	3233	Y	002	MTU
0	7	S	0	2	140	G	002	Surge Drum
0	8	T	0	1	20,120	U	002	Agent/H2O Separator
0	9	T	0	1	30,515	U	001	Hydrolyzers - two hydrolyzers work in parallel. Process rate provided for both hydrolyzers
1	0	S	0	2	9,123	G	002	Wash-Water Collection
1	1	S	0	2	10,363	G	002	Hydrolysate Hold Tank
1	2	S	0	2	2062	G	002	Spent Decon
1	3	X	9	9	565	Y	001	Toxic Maintenance Area
1	4	X	0	3	6	N	001	SDU
1	5	X	0	3	1	N	001	Autoclave
1	6	S	0	2	337,800	G	003	30-Day Tanks
1	7	T	0	1	36,576	U	004	ICB Feed Tanks
1	8	T	0	1	9,548	U	004	ICB Bioreactors - 4 modules each with 4 ICBs for a total of 16 ICBs
1	9	S	0	2	2,844	G	004	ICB Effluent
2	0	S	0	2	578,006	G	003	BC Feed Tanks
2	1	X	9	9	178,272	U	001	BRS - Evaporator, Evaporator Distillate Tank, Vapor Washer, and Crystallizer
2	2	T	0	1	178,272	U	001	BC Evaporator Feed Tank
2	3	T	0	1	26,928	U	001	Crystallizer Feed Tank
2	4	S	0	2	2,919	G	001	Carbon Filter Feed Tank
2	5	T	0	1	188,352	U	003	Carbon Filter
2	6	S	0	2	1,480	G	001	BRS Area Sump Liner Tank
2	7	S	0	1	100	Y	006	H-Block Igloo Storage Area - consists of 6 igloos, each with 100 cubic yard capacity, totaling 600 cubic yard capacity
2	8	S	0	1	840	Y	001	Munitions Bodies Storage Area
2	9	S	0	1	240	Y	001	Dunnage Storage Area
3	0	S	0	1	1686	Y	001	Waste Laydown Yard
3	1	S	0	1	56	Y	004	G-block Igloos - four (4) igloos capable of storing 204 drums each (56 cu yds); total 224 cubic yards
3	2	T	0	4	1.3	U	004	Agent-related Waste at Lab
3	3	T	0	4	5	S	001	Absorbents added to waste
3	4	T	0	4	4560	U	001	Agent-contaminated waste

7. Description of Hazardous Wastes (Enter codes for items 7.A., 7.C and 7.D(1))																	
Line Number	A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	D. PROCESSES									
	(1) Process Codes										(2) Process Description (If code is not entered in 7.D(1))						
0	9	K	9	0	1	24,039,209	P	S	0	6	X	0	2	X	0	3	Comments Section 11
1	0	D	0	0	0												Included with above - Comments Section 11
1	1	K	9	0	2	5,110,000	P	S	0	6	X	0	3	S	0	1	Comments Section 11
1	2	K	9	0	3	23,450	Y	S	0	1							Comments Section 11
1	3	F	0	0	1												Included with above
1	4	F	0	0	2												Included with above
1	5	F	0	0	3												Included with above
1	6	F	0	0	4												Included with above
1	7	F	0	0	5												Included with above
1	8	D	0	0	0												Included with above - Comments Section 11
1	9	P	0	0	0												Included with above - Comments Section 11
2	0	U	0	0	0												Included with above - Comments Section 11
2	1	K	9	0	1												Included with above
2	2	K	9	0	2												Included with above
2	3	K	9	0	1	15,600	P	T	0	4							Comments Section 11
2	4	K	9	0	2												Included with above
2	5	D	0	0	0												Included with above
2	6	P	0	0	0												Included with above
2	7	U	0	0	0												Included with above
2	8	0	0	0	0	4,314,447	P	T	0	4	T	9	4				Comments Section 11
2	9	0	0	0	0	2,801,600	P	T	0	4	T	9	4				Comments Section 11
3	0																
3	1																
3	2																
3	3																
3	4																
3	5																
3	6																
3	7																
3	8																
3	9																
4	0																
4	1																
4	2																
4	3																

11. Comments (Continued)

Section 7, Line 9: Represents the total weight of the munitions bodies in the 155 mm projectiles campaign
Section 7, Line 11: Represents the maximum weight of agent-contaminated secondary waste treatment
Section 7, Line 12 through 18: Represent PCAPP secondary wastes, laboratory wastes, and treatment residues. Wastes within this category may include any or all identified hazardous waste codes.
Section 7, Lines 10, 18 and 25: "D000" may represent the following hazardous waste codes: D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043. Characteristic waste codes apply to Lines 9, 12, and 23.
Section 7, Lines 19 and 26: "P000" represents all applicable P-series listed hazardous waste codes, including P909 and P910.
Section 7, Lines 20 and 27: "U000" represents all applicable U-series listed hazardous waste codes.
Section 7, Line 23: Represents an annual quantity of agent-related hazardous waste treated with bleach under agent fume hoods at the Lab
Section 7, Lines 28 and 29: "0000" represents waste codes that may be applicable to the waste items or containers of hazardous waste that are treated by the addition of absorbants and treated by decontamination (agent-contaminated waste). The applicable codes include any or all of the identified hazardous waate codes listed in this Hazardous Waste Permit Part A Form.
Section 8, Map: Topographic map has been submitted to CDPHE in the past and is incorporated in the current PCAPP RCRA Permit. Therefore, no map is provided with this form.
Section 9, Facility Drawing: Drawings of existing facilities have been submitted to CDPHE with the RCRA permit application and associated modification requests. Therefore, no drawings are provided with this form.
Section 10, Photographs: Photographs of existing facilities are subject to OPSEC requirements. Photographs are available upon request and contingent upon current OPSEC procedures.

Enclosure 4

Proposed Revisions to Appendix J-1 in the *Hazard Preparedness and Prevention Plan*,
Attachment J, with changes depicted using “track changes”

Description	Room No.	Requirements
Hydrolysate Hold Tank Room	APB 122	<p>Inventory limit nine (9) containers of secondary hazardous waste. Drum (55, 85 and 95-gallon) containers and containers ≤ 55-gallons (e.g., 5-gallon pails) must be placed in a dedicated area, or areas, that have boundaries marked-out on the floor or otherwise delineated. See Permit Conditions IV.D.4.a.ii through IV.D.4.a.ii.(N) for additional storage requirements. Stored containers shall be arranged to allow their inspection in accordance with the Inspection Plan (Permit Attachment K).</p> <p>Twenty-eight (28) inches minimum aisle space between rows of secondary hazardous waste, waste container, or item and structural walls or non-portable equipment or steel pallets with non-combustible hazardous waste items. A row of hazardous waste containers or steel pallets with non-combustible hazardous waste items (one container/item wide) may be placed against, or less than 28 inches from structural walls, or non-portable equipment when a minimum 28-inch aisle space is maintained to the front of the row.</p>
Glovebox Sampling Room	APB 129	<p>Inventory limit of one (1) container of secondary hazardous waste. Drum (55-gallon) containers and containers ≤ 55-gallons (e.g., 5-gallon pails) must be placed in a dedicated area, or areas, that have boundaries marked-out on the floor or otherwise delineated. See Permit Conditions IV.D.4.a.ii through IV.D.4.a.ii.(N) for additional storage requirements. The stored container shall be arranged to allow its inspection in accordance with the Inspection Plan (Permit Attachment K).</p> <p>The container may be placed against, or less than 28 inches from structural walls, or non-portable equipment when a minimum 28-inch aisle space is maintained in front and to the sides of the container.</p>
Munitions Washout System (MWS)	APB 125	<p>Each of the Munitions Reject Tables may store up to four (4) 155mm projectiles or six (6) 105mm projectiles or six (6) 4.2-inch mortar munition bodies.</p> <p>Inventory limit for each of the 10 Base Plate Collection Buckets is 25 base plates from 4.2-inch mortars.</p> <p>No more than thirty-three (33) nine (9) total secondary hazardous waste containers consisting of the following: a maximum of seven (7) 55-gallon drums plus a maximum of two (2) 4 ft X 6 ft bins:</p> <ul style="list-style-type: none"> • Inventory limit of thirty (30) containers/base units based on the following 55-gallon base unit equivalents: <ul style="list-style-type: none"> ○ Two (2) ≤ six-gallon containers = one (1) 55-gallon drum ○ One (1) > six-gallon and ≤ 55-gallon container = one (1) 55-gallon drum ○ One (1) 85- or 95-gallon drum = two (2) 55-gallon drums ○ One (1) 72 inch x 30 inch pallet = three (3) 85- or 95-gallon drums = six (6) 55-gallon drums ○ One (1) 60 inch x 30 inch pallet = two (2) 85- or 95-gallon drums = four (4) 55-gallon drums <p>AND</p> <ul style="list-style-type: none"> • Three (3) 4 ft x 6 ft bins <p>Drum (55, 85, 95-gallon) containers, and ≤ 55-gallon containers (e.g., six 5-gallon pails), and waste items on pallets must be stored in a dedicated area, or areas, that have boundaries marked-out on the floor or otherwise delineated, and each 4 ft X 6 ft bin container must be stored in one of three (3) two dedicated 8.5 ft x 6.0 ft areas that have boundaries marked-out on the floor or otherwise delineated. See Permit Conditions IV.D.4.a.ii</p>

Description	Room No.	Requirements
		<p>through IV.D.4.a.ii.(N) for additional storage requirements.</p> <p>Storage of non-combustible hazardous waste items, (e.g., pumps, piping, etc.) that cannot be placed in a waste container due to size, shape or weight shall be limited by the Permittees ability to maintain the required aisle space. All non-combustible hazardous waste items shall be drained of any free liquids and shall be placed on a metal pallet no more than one item high, unless CDPHE provides concurrence on an alternative storage arrangement/configuration. Stored non-combustible hazardous waste items and containers shall be arranged to allow their inspection in accordance with the Inspection Plan (Permit Attachment K).</p> <p>Twenty-eight (28) inches minimum aisle space between rows of secondary hazardous waste, waste container, or waste item and structural walls. Or non-portable equipment or steel pallets with non-combustible hazardous waste items. A row of hazardous waste containers or steel pallets with non-combustible hazardous waste items (one container/item wide) may be placed against, or less than 28 inches from structural walls, or non-portable equipment when a minimum 28-inch aisle space is maintained to the front of the row.</p> <p>Inventory limit per MWS line (i.e., on conveyors, held by the MHR, and within the CAMS) at any time within the MWS Room shall be as follows: seven (7) 155 mm projectiles or eight (8) 105mm projectiles or eight (8) 4.2-inch mortars munition bodies.</p>
<p>Toxic Maintenance Area - Category A Room</p>	<p>APB 126</p>	<p>Inventory limit does not exceed 26 total waste containers of RCRA-regulated secondary waste. Two (2) 4 ft x 6 ft bin containers are allowed and no more than twenty-four (24) 55-gallon drums. Containers > 55 gallon (e.g., 85/95-gallon drum containers) shall count as two (2) 55-gallon drums. Containers ≤ 55-gallons shall count as one (1) 55-gallon drum. Combination of container types is allowed but the limit of twenty-four (24) 55-gallon drum equivalents cannot be exceeded.</p> <p>Drum containers must be stored in a dedicated area, or areas, that have boundaries marked-out on the floor or otherwise delineated and each 4 ft X 6 ft bin container must be stored in one of two dedicated 8.5 ft x 6.0 ft areas that have boundaries marked-out on the floor or otherwise delineated. Storage of non-combustible hazardous waste items, (e.g., pumps, piping, etc.) that cannot be placed in a waste container due to size, shape or weight shall be limited by the Permittees ability to maintain the required aisle space. Equipment containing small quantities of occluded liquids may be stored on metal pallets not more than one item high. Stored hazardous waste items and containers shall be arranged to allow their inspection in accordance with the Inspection Plan (Permit Attachment K).</p> <p>Sealed plastic bags containing waste generated during toxic entries will be delivered to the TMA-A and then placed into a container by personnel working in TMA-A; however, if no personnel are working in TMA-A at the</p>

Enclosure 5

Proposed Revisions to the *Inspection Plan*, Attachment K,
with changes depicted using “track changes”

Table K-11 Agent Processing Building (APB) Inspection (cont'd pg. 3 of 276)

Item 6 CCR 1007-3 §264.15(b)(1)	Frequency ^a 6 CCR 1007-3 §264.15(b)(4)	Types of Problems 6 CCR 1007-3 §264.15(b)(3)
Agent Processing Building (APB)		
Munitions Washout System (MWS) Room - APB 125 ref. dwg. 24852-RD-P1-APB-P0001 Washed Agent and Water Surge Tank (MV-B02-0101 & -0201) Washed Agent and Water Booster Pump (MP-B02-0101A & -0101B and 0201A & -0201B) Cavity Access Machine (155-mm projectiles) (MZ-B02-0101 through -0105 and MZ-B02-0201 through -0205) Cavity Access Machine (105-mm projectiles) (MZ-B02-0106 through -0110 and MZ-B02-0206 through -0210) Cavity Access Machine (4.2-inch mortars) (MZ-B02-0111 through -0115 and MZ-B02-0211 through -0215) Sump Pumps (MP-B05-0041, -0042, -0044, -0045)		
Released HWCs	D	Problem: Presence of RCRA-regulated HWCs. Inspection: Inspect the area for any liquids unrelated to ongoing decontamination or maintenance operations.
24-hour Storage Limit	D	Problem: Munitions bodies stored, except on a Munition Reject Table, for longer than 24 hours. Inspection: Confirm that no munition body has been stored for longer than 24 hours.
Tank condition	D	Problem: Damage, corrosion or other deterioration of the tank causing a failure that leads to release of HWCs. Inspection: Inspect the Surge Tanks for damage or corrosion that could lead to a release of HWCs.
Overfill/Spill Control Equipment	D	Problem: Malfunction could lead to overfilling. Inspection: CON Operators monitor and record Washed Agent and Water Surge Tank liquid level and volume daily.
Washed Agent and Water Booster Pumps and Sump Pumps	D	Problem: The pumps are leaking HWCs. Inspection: Inspect the pumps to confirm that there is no leakage of washed agent or spent decon.

a. D = Once per calendar day; W = Once per calendar week; M = Once per calendar month; Q = Once per calendar quarter; S = Once per six-month calendar period; A = At least once during a 12-month period ± 30 calendar days.

Table K-11 Agent Processing Building (APB) Inspection (cont'd, pg. 5 of 276)

Item 6 CCR 1007-3 §264.15(b)(1)	Frequency ^a 6 CCR 1007-3 §264.15(b)(4)	Types of Problems 6 CCR 1007-3 §264.15(b)(3)
Agent Processing Building (APB)		
Munitions Washout System Room - APB 125 ref. dwg. 24852-RD-P1-APB-P0001		
Inventory Limit - Munitions	W	<p>1. Problem: More than four (4) 155-mm or six (6) 105-mm or six (6) 4.2-inch mortar munition bodies on either Munition Body Reject Table.</p> <p>2. Problem: More than 25 baseplates in a Base Plate Collection Bucket (4.2-inch mortar campaign only).</p> <p>3. Problem: More than seven (7) 155-mm or eight (8) 105-mm or eight (8) 4.2-inch mortar munition bodies on either Munition Washout System line (i.e., total on conveyors, held by the munitions handling robot (MHR) and within the CAMS).</p> <p>Inspection: Confirm inventory limit for each of the above three (campaign-dependent) limits is not exceeded. The inspector may use the MSM-ERB-APB inventory sheet in 24852-OPS-OAP-W0009, <i>Chemical Munitions Accountability</i> to confirm that that no more than the inventory limits 1, or 2, or 3 stated above are not exceeded in the MWS at the time of the weekly RCRA inspection.</p>
Container i Inventory Limits, Aisle Space, and Configuration	W	<p>Problem: Waste not stored per requirements.</p> <p>Inspection: Confirm the following:</p> <ul style="list-style-type: none"> • Inventory limit does not exceed thirty-three (33)nine (9) total waste containers types and equivalents, as follows: and no more than seven (7) 55-gallon drums, three (3) 85/95-gallon drums, nine (9) five-gallon pails or other ≤ 55-gallon container, (2) 4 ft. x 6-ft. bin containers of RCRA-regulated secondary waste. ○ Storage of thirty (30) or fewer containers/base units based on the following 55-gallon base unit equivalents: <ul style="list-style-type: none"> ▪ Two (2) ≤ six-gallon containers = one (1) 55-gallon drum ▪ One (1) container with volume > six-gallon and ≤ 55-gallon = one (1) 55-gallon drum ▪ One (1) 85- or 95-gallon drum = two (2) 55-gallon drums ▪ One (1) 72 inch x 30 inch pallet = three (3) 85- or 95-gallon drums = six (6) 55-gallon drums ▪ One (1) 60 inch x 30 inch pallet = two (2) 85- or 95-gallon drums = four (4) 55-gallon drums <p>AND</p> <ul style="list-style-type: none"> ○ Storage of three (3) or fewer 4 ft x 6 ft bins.

a. D = Once per calendar day; W = Once per calendar week; M = Once per calendar month; Q = Once per calendar quarter; S = Once per six-month calendar period; A = At least once during a 12-month period ± 30 calendar days.

Table K-11 Agent Processing Building (APB) Inspection (cont'd, pg. 6 of 27)

Item 6 CCR 1007-3 §264.15(b)(1)	Frequency ^a 6 CCR 1007-3 §264.15(b)(4)	Types of Problems 6 CCR 1007-3 §264.15(b)(3)
Agent Processing Building (APB)		
Munitions Washout System Room - APB 125 ref. dwg. 24852-RD-P1-APB-P0001		
Container Inventory Limits, Aisle Space, and Configuration	W	<ul style="list-style-type: none"> • That containers are stored in dedicated areas that have boundaries marked-out on the floor or otherwise delineated. • That ≤ six-gallon containers are not stacked more than two high • That ≤ six-gallon containers are stacked in a manner that ensures stability of the stacked containers • That > six gallon containers are not stacked more than one high nor exceed a vertical height of five (5) feet. • That pallets if used are metal. • That drum dollies if used are metal. • That containers and noncombustible hazardous waste items are arranged to allow their inspection in accordance with the Inspection Plan, Attachment K of this Permit. • That waste items on pallets are stacked in a manner that ensures stability of the pallet and does not exceed a vertical height of five (5) feet. • Twenty-eight (28) inches minimum aisle space between rows of RCRA-regulated waste containers, structural walls or non-portable equipment or metal, wood or plastic pallets. A row of hazardous waste containers or pallet edge (if pallet used) may be placed against, or less than 28 inches from, structural walls or non-portable equipment when a minimum 28-inch aisle space is maintained to the front of the row.
Steel-lined Sumps and Trenches	Q	<p>Problem: Deterioration of the special coating.</p> <p>Inspection: Inspect the special coating applied to the metal for damage (i.e., cracks exceeding 1/32-inch width, or gaps, divots, peeling, or similar) that exposes underlying coating or metal.</p>
Toxic Maintenance Area Category A Room - APB 126 ref. dwgs. 24852-RD-P1-APB-P0002, 24852-RD-P1-APB-P0005& 24852-RD-P1-APB-P0001 Sump Pump (MP-B05-0047)		
Released HWCs	D	<p>Problem: Presence of RCRA-regulated HWCs.</p> <p>Inspection: Inspect the area for any liquids unrelated to ongoing decontamination or maintenance operations.</p>

a. D = Once per calendar day; W = Once per calendar week; M = Once per calendar month; Q = Once per calendar quarter; S = Once per six-month calendar period; A = At least once during a 12-month period ± 30 calendar days.

Enclosure 6

Proposed Revisions to the *RCRA Inspection Sheet: APB – Weekly – MWS*
(PCAPP Form OPS-OAP-F036), Appendix K-4,
with changes depicted using “track changes”

Control Room APB MWS APB-125 Weekly RCRA Inspections						
Shift Clerk Date Stamp, Inspection Issued on:						
Inspector's Name and Signature:						
Inspection Date and Time:						
Item No.	Criteria	Method	Acceptance		Findings (any unsatisfactory condition requires this section to be completed)	
Munitions Washout System Room - APB 125, Camera 3317, 3318						
Washed Agent and Water Surge Drum (MV-B02-0101 & -0201)						
Washed Agent and Water Booster Pump (MP-B02-0101A, & -0101B and 0201A & -0201B)						
Cavity Access Machine (155 mm projectiles) (MZ-B02-0101 through -0105 and MZ-B02-0201 through -0205)						
Cavity Access Machine (105 mm projectiles) (MZ-B02-0106 through -0110 and MZ-B02-0206 through -0210)						
Cavity Access Machine (4.2-inch mortars) (MZ-B02-0111 through -0115 and MZ-B02-0211 through -0215)						
1	Inspect the listed equipment and the following visible vent piping for indications of mechanical damage, wear, holes, gaps, cracks, corrosion or deterioration that could cause or lead to releases of RCRA-regulated HWCs (including vapors, gases, and hazardous waste process liquids) to the environment.	Labeled B20-VT OTS Vent Gas , originating from the door of APB 125 A and terminating at the wall of 133E (not in use until closure)	Physical	N/A		No inspection required until SDU#2 installed
		Inspect the OTS piping labeled B20-VT OTS Vent Gas , originating from the MWS Blowers terminating at the header vent line	Remote	<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	For insulated vent piping inspect the insulation on the duct for damage that could indicate leakage, or damage to the underlying duct that requires additional evaluation by a subject matter expert. This damage includes missing insulation, impact or corrosion holes in the insulation and deep dents in the insulation	Inspect the OTS vent piping labeled B20-VT OTS Vent Gas , originating at the B02 MWS Surge Drum, and terminating at the point where the piping passes through the east wall into the TOX Room	Remote	<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	

Control Room APB MWS APB-125 Weekly RCRA Inspections					
Shift Clerk Date Stamp, Inspection Issued on:					
Inspector's Name and Signature:					
Inspection Date and Time:					
Item No.	Criteria	Method	Acceptance		Findings <small>(any unsatisfactory condition requires this section to be completed)</small>
2	Inspect the special coating applied to the secondary containment surfaces for damage (i.e., cracks exceeding 1/32 inch width, or gaps, divots, or similar) that exposes underlying coating or concrete. 1. Inspect the special coating applied to the secondary containment surfaces for damage (i.e., cracks exceeding 1/32 inch width, or gaps, divots, or similar) that exposes underlying coating, concrete or metal.	Physical	<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	2. Inspect the special coating applied to the anchor bolts, anchor nuts and washers mounting equipment plates, support beams, tanks, or other equipment to the floor for damage (i.e., cracks exceeding 1/32 inch width, or gaps, divots, or similar) that exposes underlying coating, concrete or metal.		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	3. Inspect the caulking sealant that has been applied at the interface between equipment floor plates, support beams, tanks or other equipment bolted down for gaps or holes that exposes underlying coating, concrete or metal.		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
3	<p>Confirm inventory limit for each of the following three (campaign dependent) limits is not exceeded.</p> <ul style="list-style-type: none"> Four (4) 155mm or s Six (6) 105mm or six (6) 4.2-inch mortar munition bodies on either Munition Body Reject Table. 25 baseplates in a Base Plate Collection Bucket (4.2-inch mortar campaign only). Seven (7) 155mm or e Eight (8) 105mm or eight (8) 4.2-inch mortar munition bodies on either Munition Washout System line (i.e., total on conveyors, held by the MHR and within the CAMS). <p>The inspector may use the MSM-ERB-APB inventory sheet in 24852-OPS-OAP-W0009, Chemical Munitions Accountability, to confirm that the inventory limits stated above</p>	Remote	<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	

Control Room APB MWS APB-125 Weekly RCRA Inspections					
Shift Clerk Date Stamp, Inspection Issued on:					
Inspector's Name and Signature:					
Inspection Date and Time:					
Item No.	Criteria	Method	Acceptance		Findings (any unsatisfactory condition requires this section to be completed)
	are not exceeded in the MWS at the time of the weekly RCRA inspection.				
	Confirm the following: <ul style="list-style-type: none"> Inventory limit does not exceed thirty three (33) nine (9) total containers of RCRA-regulated secondary waste as described in Note 1 and shown in the figure below. With storage of no more than seven (7) 55-gallon drums, three (3) 85/95-gallon drums, seven (7) five-gallon pails or other ≤ 55-gallon container, or combination of the above and no more than (2) two 4 ft. x 6 ft. bin containers. 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	<ul style="list-style-type: none"> Containers and palletized waste items do not block egress or restrict personnel from exiting in an emergency. 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	<ul style="list-style-type: none"> That containers are stored in dedicated areas that have boundaries marked-out on the floor or otherwise delineated. 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	<ul style="list-style-type: none"> That each container is marked with the words "Hazardous Waste" or has a Hazardous Waste label affixed. NOTE: labelling is required for bins. 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
3	<ul style="list-style-type: none"> That each container is marked with a unique container tracking/identification number. NOTE: labelling is required for bins. 	Remote	<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	<ul style="list-style-type: none"> That the labels are legible and oriented to face outward to allow inspection. 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	<ul style="list-style-type: none"> That ≤ six-gallon containers are not stacked more than two high. (NOTE: Inspection criteria does not apply to plastic bags in bin container) 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	

Control Room APB MWS APB-125 Weekly RCRA Inspections					
Shift Clerk Date Stamp, Inspection Issued on:					
Inspector's Name and Signature:					
Inspection Date and Time:					
Item No.	Criteria	Method	Acceptance		Findings <small>(any unsatisfactory condition requires this section to be completed)</small>
	<ul style="list-style-type: none"> That > six-gallon containers are not stacked and do not exceed a vertical height of five (5) feet. (NOTE: Inspection criteria does not apply to plastic bags in bin container) 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	<ul style="list-style-type: none"> That ≤ six-gallon containers are stacked in a manner that ensures stability of the waste containers 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	<ul style="list-style-type: none"> That waste items on pallets are stacked in a manner that ensures stability of the pallet and does not exceed a vertical height of five (5) feet. 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	<ul style="list-style-type: none"> That pallets if used are metal. 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	<ul style="list-style-type: none"> That drum dollies if used are metal. 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
	<ul style="list-style-type: none"> Twenty-eight (28) inches minimum aisle space between rows of RCRA-regulated waste containers, structural walls or non-portable equipment or metal, wood or plastic pallets. A row of hazardous waste containers or pallet edge (if pallet used) may be placed against, or less than 28 inches from, structural walls or non-portable equipment when a minimum 28-inch aisle space is maintained to the front of the row. 		<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	
4	Confirm that stored drum containers are closed, not leaking, and structurally sound without deterioration, defect or corrosion that could lead to a release/spill of its hazardous waste contents. (NOTE: Inspection criteria does not apply to plastic bags in bin containers or the bin containers)	Remote	<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Unsat	

Control Room APB MWS APB-125 Weekly RCRA Inspections	
Shift Clerk Date Stamp, Inspection Issued on:	
Inspector's Name and Signature:	
Inspection Date and Time:	
TO BE COMPLETED BY THE SUPERVISOR OR DELEGATE BY THE END OF WEEK	
List all Service Requests/Work Order Numbers generated from this inspection sheet and additional comments	
I have reviewed this inspection sheet and found it to be complete and accurate to the best of my knowledge	Supervisor Initials
<p>Note 1:</p> <p>(1) Container types and equivalents:</p> <p style="padding-left: 20px;">Storage of thirty (30) or fewer containers/base units based on the following 55-gallon base unit equivalents:</p> <ul style="list-style-type: none"> • Two (2) ≤ six-gallon containers = one (1) 55-gallon drum • One (1) container with volume > six-gallons and ≤ 55-gallons = one (1) 55-gallon drum • One (1) 85- or 95-gallon drum = two (2) 55-gallon drums • One (1) 72 inch x 30 inch pallet = three (3) 85- or 95-gallon drums = six (6) 55-gallon drums • One (1) 60 inch x 30 inch pallet = two (2) 85- or 95-gallon drums = four (4) 55-gallon drums <p>AND</p> <p style="padding-left: 20px;">Storage of three (3) or fewer 4 ft x 6 ft bins</p> <p>Typical container storage examples:</p> <p>(a) Example 1</p> <ul style="list-style-type: none"> • Ten (10) 55-gallon drums • Two (2) 72 inch x 30 inch pallets with stacked waste items • Two (2) 60 inch x 30 inch pallets with stacked waste items • Three (3) 4 ft x 6 ft bins <p>(b) Example 2</p> <ul style="list-style-type: none"> • Two (2) six-gallons stacked containers (e.g., pails or buckets) • Nine (9) 55-gallon drums • Three (3) 85- or 95-gallon drums (equivalence to one (1) 72 inch x 30 inch pallet with stacked waste items) • One (1) 72 inch x 30 inch pallet with stacked waste items • Two (2) 60 inch x 30 inch pallets with stacked waste items • Three (3) 4 ft x 6 ft bins <p>(2) Approved storage locations marked on floors and shown in following figure.</p>	

Control Room APB MWS APB-125 Weekly RCRA Inspections

Shift Clerk Date Stamp, Inspection Issued on:	
Inspector's Name and Signature:	
Inspection Date and Time:	

MWS Room Hazardous Waste Container and Pallet Storage Locations

